

**IN THE UNITED STATE DISTRICT COURT
FOR THE EASTERN DISTRICT OF ARKANSAS
JONESBORO DIVISION**

TRI STATE ADVANCED SURGERY
CENTER, LLC, GLENN A. CROSBY II, M.D.,
F.A.C.S., and MICHAEL HOOD, M.D.,

Plaintiffs

v.

HEALTH CHOICE, LLC, and
CIGNA HEALTHCARE OF TENNESSEE, INC.,

Defendants

Case No. 3:14-CV-00143-JM

CONNECTICUT GENERAL LIFE INSURANCE
COMPANY, CIGNA HEALTH AND LIFE
INSURANCE COMPANY, CIGNA HEALTH AND
LIFE INSURANCE COMPANY, and CIGNA
HEALTHCARE OF TENNESSEE, INC.,

Counterclaim Plaintiffs

v.

SURGICAL CENTER DEVELOPMENT, INC.
D/B/A SURGCENTER DEVELOPMENT, and
TRI STATE ADVANCED SURGERY CENTER, LLC,

Counterclaim Defendants

COUNTERCLAIM DEFENDANTS' MOTION TO STAY DISCOVERY

Counterclaim Defendants Tri State Advanced Surgery Center, LLC and Surgical Center Development, Inc. d/b/a SurgCenter Development respectfully move this Court for an order staying all discovery in this matter pending the outcome of Plaintiffs' Motion for Leave to File an Amended Complaint ("Motion for Leave to Amend") (Docket No. 80). A stay of discovery is crucial in this case because many of the parties' discovery requests and obligations are related to

Plaintiffs' dismissed Sherman Act claim, and without a stay, would subject the parties to unnecessary duplicative discovery. Counterclaim Plaintiffs oppose this Motion.

In support of their Motion to Stay Discovery, Counterclaim Defendants submit the attached Memorandum in Support of Counterclaim Defendants' Motion to Stay Discovery.

Dated: May 18, 2015

Respectfully submitted,

/s/ W. Tucker Brown

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CERTIFICATE OF SERVICE

I hereby certify that on this 18th day of May, 2015, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which shall send notification of such filing to all counsel of record.

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